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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA**

JOHNATHAN TALBOT,

Plaintiff,

v.

MANOAH AINUU, *et al.*,

Defendants.

Case No. 2:23-cv-00066-BMM

**COMBINED MOTION TO DISMISS AND SPECIAL MOTION
FOR EXPEDITED RELIEF BY DEFENDANT
VF OUTDOOR, LLC d/b/a THE NORTH FACE**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and Section 4.105.020 of the Revised Code of Washington (“RCW”), Defendant VF Outdoor, LLC d/b/a The North Face (“TNF”), incorrectly sued as The North Face Apparel Corporation, respectfully moves to dismiss Plaintiff Johnathan Talbot’s Complaint. TNF also respectfully requests that the Court award its attorneys’ fees and costs pursuant to RCW § 4.105.090. In accordance with L.R. 7.1, TNF’s motion is supported by a separately-filed memorandum of law and the declaration of Leita Walker with attached exhibits.

Signatures on following page

Respectfully submitted this 18th day of December, 2023.

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*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on 18 December 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record pursuant to the Local Rules.

/s/ *Leita Walker*
Leita Walker